

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION

FRANCES EARLINE SIMS, individually
and as dependent administrator of, and on
behalf of, the ESTATE OF STEVEN
MITCHELL QUALLS and STEVEN
MITCHELL QUALLS' heir(s)-at-law,
Plaintiff,

V.

CITY OF JASPER, TEXAS; TODERICK
D. GRIFFIN; STERLING RAMON
LINEBAUGH; HEATHER RENE
O'DELL, and JOSHUA L. HADNOT,
Defendants.

[illegible]

CIVIL ACTION NO. 1:20-CV-00124
JURY DEMANDED

DEFENDANTS' OBJECTIONS TO PLAINTIFF'S MOTION *IN LIMINE*

Defendants City of Jasper, Texas and Officers Toderick D. Griffin, Sterling Ramon Linebaugh, Heather Rene O'Dell, and Joshua L. Hadnot oppose the following requests in Plaintiff Frances Earline Sims's motions *in limine* as follows:

MOTION IN LIMINE NO. A9

MOTION IN LIMINE NO. A10

MOTION IN LIMINE NO. A12

MOTION IN LIMINE NO. C1

MOTION IN LIMINE NO. C3

MOTION IN LIMINE NO. C4

MOTION IN LIMINE NO. C5

MOTION IN LIMINE NO. C6

MOTION IN LIMINE NO. D2

MOTION IN LIMINE NO. D3

MOTION IN LIMINE NO. E3

MOTION IN LIMINE NO. E4

MOTION IN LIMINE NO. E5

MOTION IN LIMINE NO. E7

MOTION IN LIMINE NO. E8

MOTION IN LIMINE NO. G2

MOTION IN LIMINE NO. G3

MOTION IN LIMINE NO. G4

MOTION IN LIMINE NO. G5

MOTION IN LIMINE NO. G6

Respectfully Submitted,

LEWIS BRISBOIS BISGAARD & SMITH LLP

By: /s/ William S. Helfand

William S. Helfand

Texas State Bar No. 09388250

Norman Ray Giles

Texas State Bar No. 24014084

24 Greenway Plaza, Suite 1400

Houston, Texas 77046

Telephone: (713) 659-6767

Facsimile: (713) 759-6830

bill.helfand@lewisbrisbois.com

norman.giles@lewisbrisbois.com

ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served on all the following attorneys of record on May 20, 2021:

T. Dean Malone
dean@deanmalone.com

Kristen Homyk
kristen.homyk@deanmalone.com

Michael O'Connor
michael.oconnor@deanmalone.com

/s/ William S. Helfand
William S. Helfand